

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AULISTAR MARK, HANCHEN LU and	:	
ANDREW HUDSON, Individually and on Behalf of	:	
All Others Similarly Situated,	:	
	:	
Plaintiffs,	:	Civil Action No. 1:13-cv-04347
-against-	:	
	:	
GAWKER MEDIA LLC, and NICK DENTON,	:	
	:	
Defendants.	:	
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AFFIDAVIT OF ROSE ANNIS

ROSE ANNIS declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts sets forth in this Declaration, or I have learned said facts.
2. I was an intern with Gawker.TV ("GTV") from September 2009 until December 2009. Subsequently, I worked for Gawker Media, LLC ("Gawker") in various capacities as an employee. In April 2010 I was hired as a part-time freelance Junior Copywriter, then in February 2011 I was hired as a full-time Copywriter, and finally in July 2013 I was promoted to my current position of Product Strategist.
3. I have never supervised interns at Gawker.
4. After college, I specifically sought an internship either with Gawker or the NPR show *This American Life*. I learned about the internship opening at Gawker via a post on Gawker.com, calling for a general television internship.

5. The internship application process was fairly informal. I sent in an email with a writing sample. After that, I was called to come in for a brief interview with Richard Blakeley (then the Editor-In-Chief of GTV), who would be my supervisor. A week later I received an email offering me an internship, which I started in September 2009. Approximately 10 interns, including myself, started as television interns at around the same time.

6. I did not receive any compensation nor did I receive academic credit, since I was not in college at the time of my internship.

7. The schedule for television interns was a bit more regular than schedules for other interns at Gawker. Typically, each intern came into Gawker's New York offices for two days a week from around 9am-5pm. In my particular case, I was on the schedule Wednesdays and Fridays. Occasionally we would put in more hours if there was a particular project we liked and wanted to pitch to our supervisors for actual publication, but we did not spend our entire time in the office on our intern assignments and were free, to the extent we had extra time, to do our own personal projects.

8. I knew from the outset of the internship that it ended in December 2009. After that, the next group of interns came on. We did not overlap with the new group of interns who came in beginning January 2010.

9. Though my internship was initially a general television internship for Gawker, within a few weeks of my starting the company created GTV, and I became a GTV intern, but nothing substantive about the internship changed.

10. The internship started with a few days of formal training. I unfortunately missed the first day of that training, but I was present for the rest of the training. The

supervisors showed interns how to use the software GTV used at the time for video editing, such as Motionbox and iMovie. Some interns required a lot of training in this software, but I personally had some video editing training before, so it was not necessary for me to do as much of the editing training. We were also trained in how to watch certain television shows and how to spot clips that were relevant to GTV or to other Gawker sites. I think the best training occurred around pitch process. The supervisors taught us a lot about how to craft a story in a way that will get an editor's attention. All of the posts for GTV had to be 40 words or less, so we were also taught this format, which was challenging to learn due to its need to be catchy, yet concise. The supervisors taught us how to use the GTV format so the intended audience would pay attention to the videos and stories we were crafting for the site.

11. Each GTV intern received a list of television shows to watch while in the office. We would watch the shows, sometimes four screens at a time, to find unique moments that could be turned into a post. Our selection was reactive to what was on the news of the day. Another GTV intern duty involved collecting clips of a specific show from a specific date and delivering them to their editor for the editor to use when writing a post. At the time, we also created a lot of what we called supercuts, which were single videos composed of short snippets of clips. For example, I created a supercut of about 25 celebrities before they were famous. It consisted of clips of the celebrities' first appearance on camera. I completed that project on my own, pitched it to Gawker, and successfully got it published on the front page of the site. This was a great learning experience for me, because I was able to see an idea through to a successful pitch of my own. In another instance, I created a supercut of outrageous ice-skating falls which was

published on another Gawker site, Deadspin.com. If GTV interns wrote a post, they would receive a byline just like the editors. I received a byline in both of the instances mentioned above. Interns would also receive online recognition from the editors through a small note at the bottom of a post with which they assisted. The note would acknowledge the intern's help by saying something to the effect of, "Thanks to intern Rose."

12. GTV interns did not have access to the tools that would allow them to upload posts to the sites on their own. It was necessary for GTV interns' supervising editors to look at the post to edit it before the editor would consider posting pieces by interns.

13. I believe my internship at GTV was extremely beneficial and educational. I had previously interned at a production house for a documentary film, which was a completely different experience. Those internships helped me decide that I wanted to work in the digital world at a place like Gawker. My GTV internship was critical in helping me understand how to work at a place that was so fast-paced, and taught me a lot of industry basics that were instrumental in my being able to present myself as a viable candidate in the industry. GTV provided me with a perspective on the fast-moving world of digital publishing, and I do not think I would have understood how quickly it works if I had been an outsider to the industry. I was introduced to so many contacts in the industry during my GTV internship. Finally, the Gawker name is powerful on my resume. Other employers have been more interested in me because I had the GTV experience on my resume.

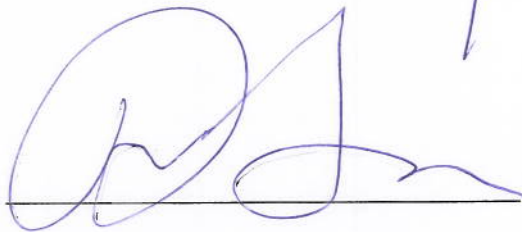
14. Additionally, interning at GTV provided a key opportunity to network and meet people. During the internship, Richard and GTV provided extensive resources for obtaining a full-time job in the digital video industry, even if not at Gawker or GTV. Richard would email the interns job listings and lists of companies to target in our job search. GTV also maintained a large dashboard listing external resources to find jobs. When I finished my internship at GTV, my GTV supervisors Richard Blakeley and Whitney Jefferson wrote several job recommendations and really advocated for me.

15. Immediately after my internship with GTV ended in December 2009, I was a nanny, a freelance video editor and production assistant. In April of 2010, I came on part-time as a freelance Junior Copywriter for Gawker, before I was hired full-time. I believe that having the GTV internship was very helpful in being hired full-time. Though my tasks were different, I had a firm understanding of the digital publishing industry, the kind of content Gawker produces, and the pace at which the industry works.

16. Before I provided the information for this declaration, I was asked if I intended to join the current lawsuit (I do not). Before I provided the information for this statement, certain information was communicated clearly to me, including that my participation was completely voluntary. Then, I made a voluntary decision to provide the information for and to sign this statement.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 9th day of January, 2014 in New York, NY.

A handwritten signature in blue ink, appearing to read 'Rose Annis', written over a horizontal line.

ROSE ANNIS